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Arizona Corporation Commission

**DOCKETED**

OCT 23 2003

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October 23, 2003

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Teena Wolfe  
Administrative Law Judge  
Hearing Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

E-00000A-02-0051  
E-01345A-01-0822  
E-00000A-01-0630  
E-01933A-02-0069

Re: Response to AEPCO's Comments on the Staff Supplemental Filing Dated September 29, 2003; In the Matter of the Generic Proceeding Concerning the Arizona Independent Scheduling Administrator; Docket No. E-00000A-01-0630

Dear Ms. Wolfe:

This letter is written in response to the letter of Mr. Michael M. Grant concerning AEPCO's comments as to its view of the costs that would be involved in re-forming the AISA in the future, and to make a second submission of the matter to FERC for its approval.

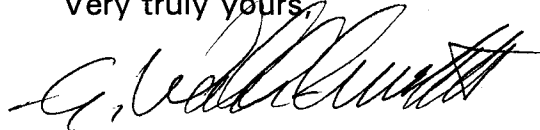
Mr. Grant's letter ignores the fact that the first time the AISA protocols were approved by FERC, the AISA's filing was opposed by certain parties who are not participants in the current Arizona Corporation Commission proceeding. If the AISA were terminated today and approval for new or reinstated protocols were later sought from FERC, it is logical to conclude that those same opponents who initially opposed the approval of the protocols would, again, show up and take advantage of another opportunity to oppose the (re)formation of the AISA. Resisting that opposition would involve considerable time, effort, and money. No assurances by AEPCO in this proceeding can waive those other parties' rights at

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FERC or impact their legal strategies or minimize the cost of overcoming the objection to FERC approving the AISA protocols.

Very truly yours,



C. Webb Crockett

CWC/mb

**ORIGINAL** and 21 COPIES of the foregoing  
**FILED** this October 23, 2003, with

Docket Control  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

**COPY OF THE FOREGOING Hand-delivered**  
this October 23, 2003, to:

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William A. Mundell  
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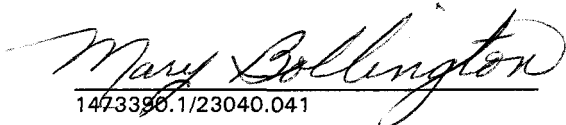
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**COPY** of this letter **MAILED** to  
all parties of record.

  
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